NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

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MAR 0 5 2020

Mr. Robert P. Gordon
Site Manager
U.S. Department of Energy
53 Bell Ave, Building 464
Upton, NY 11973-5000

Re: Brookhaven National Laboratory (Site ID: 152009)

Dear Mr. Gordon:

The New York State Department of Environmental reviewed the Phase 4 Work Plan Characterization of Per- and Polyfluoroalkyl Substances (PFAS) and 1,4 Dioxane in Select On-Site and Off-Site Monitoring Wells and Off-Site Extraction Wells and Treatment Systems, dated January 27, 2020. The Department provides the enclosed comments. Please contact me at (518) 402-9626 if you have any questions and to schedule the site evaluation.

Regards,

Brian Jankauskas, P.E.
Project Manager
Remedial Bureau A, Section C

enclosure

cc: J. Swartwout, DEC
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1. Section 3.1 Monitoring Wells – Indicates that samples will be collected from monitoring wells with pumps equipped with a Teflon containing bladder and tubing. The Department understands the proposed method but recommends that sampling include additional QA/QC evaluation be performed to assess impacts from the Teflon parts on the samples. This can be done by collecting a few additional samples from select wells using equipment without Teflon parts and/or collecting equipment samples from the Teflon parts. Additional consideration would be to confirm any unusual values by resampling the monitoring well using Teflon free equipment.

2. Section 3.1 Sample Analysis and Reporting – Change section number to 3.3. Method 522 is specified for the 1,4 dioxane analysis. This is typically used for a drinking water sample. Method 8270 SIM is typically used for groundwater water samples. Suggest analyzing the 1,4 dioxane samples using 8270 SIM method.

3. Table 5 – Equipment blank samples should be included for new equipment to determine if any PFAS are present due to the manufacturing of the equipment.

4. Figure 1 – Verify that all monitoring wells are located on the figure as 26 monitoring wells (e.g. 007-05, 54-191,96-117) from Table 1 were not located on the figure.

5. The Department suggests that a shallow groundwater sample near the system discharge locations be collected. This information along with the effluent concentrations may help to evaluate detections of elevated concentrations from a treatment system effluent.